

IN THE STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

WPS ENERGY SERVICES, INC.	:	
	:	
APPLICATION FOR CERTIFICATE OF	:	Docket No. 00-0199
SERVICE AUTHORITY UNDER SECTION	:	(Reopened)
16-115 OF THE PUBLIC UTILITIES ACT	:	

MOTION FOR MODIFICATION OF SCHEDULE

Comes now WPS Energy Services, Inc., (“WPS-ESI”) by its attorneys, Lueders, Robertson & Konzen, and for its Motion for Modification of Schedule, or in the alternative, for additional time to reply to comments, state as follows:

1. That at approximately 2:00 p.m. on later on Monday, April 2, 2001, attorneys for WPS-ESI learned that parties other than the Illinois Energy Association and the IBEW have filed Petitions for Leave to Intervene and filed Comments in response to the Illinois Commerce Commission (“Commission”) Staff Report.

2. That copies of these Petitions for Leave to Intervene and Comments have not yet been served upon WPS-ESI, or its attorneys.

3. That WPS-ESI and its attorneys have had insufficient time (from approximately 2:00 p.m. to 4:00 p.m., Monday, April 2, 2001), to prepare a reply to the comments filed by these parties or to consider whether or not they are proper parties to this proceeding.

4. That the schedule approved and ratified by the Commission is arbitrary, unreasonable and unlawful and deprives WPS-ESI of its due process rights in that it requires that WPS-ESI respond to parties who have not served their pleadings upon WPS-ESI or upon its representatives, in time for WPS-ESI and its representatives to make a valid reply.

5. WPS-ESI should be granted additional time in which to reply to these comments and the Petitions to Intervene filed by these parties by no later than Thursday, April 5, 2001, and the hearing scheduled in this cause should be continued from April 5, 2001 to a date certain.

WHEREFORE, WPS-ESI respectfully move that it be granted until April 5, 2001 to reply to the comments of parties who have not yet served WPS-ESI with their comments or their Petitions for Leave to Intervene and that the hearing in this cause be continued from April 5, 2001 to a date certain.

Respectfully submitted,

Eric Robertson
Lueders, Robertson & Konzen
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Granite City, IL 62040
618-876-8500
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STATE OF ILLINOIS :
 :
COUNTY OF MADISON :

SS

VERIFICATION

Eric Robertson, being one of the attorneys for WPS-ESI, being duly sworn on oath does
depone and state that the information contained in the foregoing Motion is true and correct.

Eric Robertson
Lueders, Robertson & Konzen
1939 Delmar Avenue
Granite City, IL 62040
618-876-8500
erobertson@lrklaw.com

SUBSCRIBED AND SWORN TO before me, a Notary Public, on this 2nd day of April, 2001.

NOTARY PUBLIC

IN THE STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION

WPS ENERGY SERVICES, INC.	:	
	:	
APPLICATION FOR CERTIFICATE OF	:	Docket No. 00-0199
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NOTICE OF FILING

TO: See Attached Service List

PLEASE TAKE NOTICE that on this 2nd day of April, we have electronically filed with the Illinois Commerce Commission, WPS Energy Services' Motion for Modification of Schedule, along with Proof of Service thereon attached.

-

Eric Robertson
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PROOF OF SERVICE

STATE OF ILLINOIS :
 :
COUNTY OF MADISON :

SS

I, Eric Robertson, being an attorney admitted to practice in the State of Illinois and one of the attorneys for WPS Energy Services, Inc., herewith certify that I did on the 2nd day of April, 2001, electronically file with the Illinois Commerce Commission, WPS Energy Services' Motion for Modification of Schedule, and serve upon the persons identified on the attached service list, both electronically and by depositing same in the United States Mail, in Granite City, Illinois with postage fully prepaid thereon.

Eric Robertson
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(618) 876-8500

SUBSCRIBED AND SWORN to me, a Notary Public, on this 2nd day of April, 2001.

Notary Public

WPS ENERGY SERVICES
ICC Docket No. 00-0199
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